

CONFLICT OF INTEREST GUIDELINES



DEFINITION



EXAMPLE



KEY MESSAGE

WHY THE IBU NEEDS THESE GUIDELINES

In order to protect IBU and IBU Officials' reputation and integrity, handling Conflicts of Interest is a matter of the utmost importance for IBU. At the basis of most of serious events undermining the reputation of a sports governing body, lies a Conflict of Interest. By implementing these guidelines, the IBU is seeking to: (i) prevent ethical misconduct and possible criminal activity that can start with a Conflict of Interest; (ii) safeguard the integrity of IBU Officials, including by dismissing any preferential treatment and unfair advantages; and (iii) minimise risks of cronyism and patronage. Each IBU Official is responsible for compliance with these guidelines. Breaches of these guidelines may amount to a breach of the IBU Integrity Code and other IBU Rules, with the associated sanctions at risk of being enforced.

WHAT IS A CONFLICT OF INTEREST

In order to make sound decisions when faced with a Conflict of Interest, all IBU Officials need to understand the risks of organisational and personal Conflicts of Interest, what situations to avoid, why they should be avoided and how to report Conflicts of Interests.

Knowing the "what", "why" and "how" will enable IBU Officials to make sound decisions when faced with a Conflict of Interest by identifying, disclosing and mitigating the conduct appropriately.



A Conflict of Interest may arise when personal interests, activities or relationships affect an IBU Official's ability to be impartial and do what is in the best interest of the IBU. A Conflict of Interest can be real, potential or perceived.



A Conflict of Interest is considered real when a person has an interest (not in line with IBU's interests) that will influence his/her judgement and decision making.



A Conflict of Interest is considered as potential when a Conflict of Interest is predictable but not yet real. It will depend on a future event that may occur.



A Conflict of Interest is considered as perceived when a reasonable third person is concerned about the existence of a Conflict of Interest of an IBU Official.

When it comes to Conflicts of Interest, facts, appearances and perceptions are the determining factors. A perception of a Conflict of Interest emanating from a third party can be as damaging as an established Conflict of Interest. The reputations of IBU Officials, the IBU and even yourself as an individual can be hindered.

DEALING WITH A CONFLICT OF INTEREST

IDENTIFICATION OF A CONFLICT OF INTEREST

A Conflict of Interest can happen to any IBU Official and at any times. Being in a situation where a Conflict of Interest arises is not imperatively constitutive of a misconduct. However, a Conflict of Interest that is not disclosed in a timely manner to the Biathlon Integrity Unit may become an issue. Every IBU Official should strive to be as transparent as possible in order to avoid situations where a Conflict of Interest can arise.



Outside employment: you or a relative are employed by, provide services for, or receive payments/other benefits from a supplier or partner with whom you are actively working.



Financial interests: you or a relative have a substantial investment or other major financial interest in a IBU Commercial Partner, and, in your role within IBU, you have an active working relationship with or responsibility towards this IBU business partner.



Personal relationships at work: 1) you supervise or are supervised by a relative; 2) you hire a relative; or 3) you hire, directly or indirectly, a relative as a supplier.



Corporate opportunities: you take personal advantage of a business opportunity that IBU may also have an interest in (unless IBU has already been made aware of and declined the opportunity).



Sponsor: Your main day-to-day activity is not related to IBU and involves negotiating or working for or on behalf of marketing companies that may also have a commercial interest with IBU.

DISCLOSURE OF CONFLICTS OF INTERESTS

Avoiding Conflict of Interest situations is not always possible, but IBU Officials are required to take the necessary steps to disclose any Conflict of Interest that may occur. One easy way to disclose Conflicts of Interest is via email to the Head of the BIU to greg.mckenna@biathlonintegrity.com. The disclosure process set within the IBU is as described below, and is monitored by the BIU:

1. Disclosure statement, every two years – Each IBU Official is required, during the process leading to their appointment or election as IBU Official, to disclose and submit any Conflict of Interest to the Head of the BIU, by completing BIU's disclosure statement form.
2. Ad-hoc disclosure – If the current biennial disclosure statement is no longer up to date, IBU Officials are required to inform the Head of the BIU immediately. If an IBU Official realises they may be involved in a real, potential or perceived Conflict of Interest before or during a meeting, they should get in touch with the Chair of the meeting without delay.
3. Procurement process – In addition to the above, each project lead must transparently declare any potential Conflict of Interest situation during the procurement process.



When in doubt regarding a Conflict of Interest that may arise outside of a meeting (in a meeting, the Chair of the Meeting should be the first point of contact), IBU Officials should not hesitate to reach out to BIU for advice regarding a situation that could potentially be labelled as a real, potential or perceived Conflict of Interest.

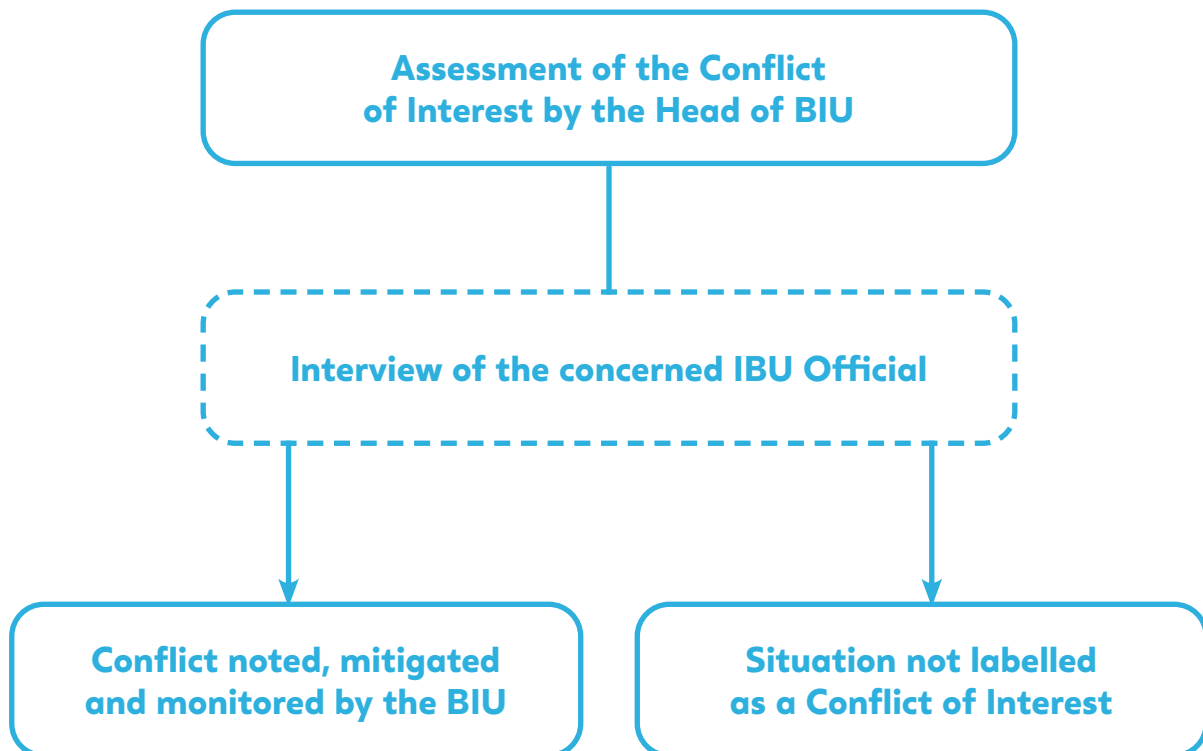
WHAT HAPPENS AFTER DISCLOSURE

Assessment

The Head of the BIU will assess the situation that may lead to a real, potential or perceived Conflict of Interest. Risk exposure for other IBU Officials and the IBU may be considered. For this purpose, the Head of the BIU may require from the IBU Official that they attend an interview before the BIU.

Decision

In light of the information at hand, the Head of the BIU will render a reasoned decision regarding the Conflict of Interest. The Conflict of Interest will be either (a) noted, mitigated and monitored by the BIU; or (b) considered null as the situation is not labelled as a Conflict of Interest.



COMPLIANCE AND ENFORCEMENT OF THESE GUIDELINES

The BIU will closely monitor and test the execution of these Guidelines.